

MISSOURI FARM BUREAU FEDERATION

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U.S. Department of Agriculture
Animal and Plant Health Inspection Service
Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238

Re: Docket No. 05-015-1

To Whom It May Concern:

Missouri Farm Bureau, the state's largest general farm organization, is pleased to submit comments on the Draft Strategic Plan and Draft Program Standards documents for the National Animal Identification System (NAIS). We appreciate USDA's commitment to seeking guidance from livestock producers, agriculture organizations, and industry regarding the development of this program.

In general, Missouri Farm Bureau supports the creation and establishment of a national animal identification system. One of the lessons we have all learned in recent years is that the ability to identify and track animals for disease control purposes is critical to safeguarding our industry and maintaining domestic and foreign consumer confidence in the U.S. food supply.

At the animal identification listening session in Joplin, Missouri last summer, we encouraged USDA to take its time in developing the NAIS and emphasized the importance of producer and industry involvement. We also urged the Department to address producers' concerns about the cost of the system, confidentiality, and liability. It remains imperative that these issues be resolved as USDA moves forward.

Following are our responses to the questions presented in the draft documents.

- 1. Is a mandatory identification program necessary to achieve a successful animal disease surveillance, monitoring and response system to support federal animal health programs?*

We believe a mandatory identification program will ultimately be necessary for two primary reasons: a) to effectively control and eradicate animal diseases and b) to meet the demands of domestic and foreign consumers. At this time, however, the system should remain voluntary due to producers' concerns about cost, confidentiality and liability. Farm Bureau urges USDA to address these critical issues before moving forward with any other technical aspects of the system.

2. *At what point and how should compliance be ensured? For example, should market managers, fair managers, etc., be responsible for ensuring compliance with this requirement before animals are unloaded at their facility or event? Please give the reasons for your response.*

Livestock owners and managers of premises that receive animals should share in the responsibility of ensuring compliance with the NAIS. While compliance with the system should not be required prior to the movement of an animal from its original premises, livestock owners should ensure proper identification has been applied or will be applied prior to completing the animal movement. In some cases, a tagging service may be available at the receiving premises. Producers should expect to pay a fee for this service. The manager of the receiving premises should be responsible for reporting animal movements.

3. *Can markets or other locations successfully provide a tagging service to producers who are unable to tag their cattle at their farms?*

Livestock auction barns and other locations where animals are commingled could provide a tagging or other application service to producers who are unable to apply an identification device to animals at their original premises. These entities, however, should not be mandated to provide such a service. We believe some producers would take advantage of a tagging service and would be willing to pay a fee for the convenience of tagging livestock at the market or another location rather than setting up a system to identify animals on their farm.

4. *In what manner should compliance with the identification and movement reporting requirements be achieved? Who should be responsible for meeting these requirements? How can these types of transactions be inputted into the NAIS to obtain the necessary information in the least costly, most efficient manner?*

As was previously mentioned, livestock owners and managers of premises that receive livestock should share the responsibility of ensuring compliance with the NAIS. The livestock owner or seller should be responsible for identification requirements, while the manager of the receiving premises (i.e. buyer) should be responsible for reporting animal movements. The NAIS is best served if both the seller and buyer report animal movements, but it should only be optional for sellers. If an intermediary agent is involved in the transaction, the agent should have the ability to report movement as a service to their client on either or both ends of the transaction.

While the Internet may be the most cost-effective method for sharing information, all producers do not have the capability of submitting information online. Individuals should be able to use postal mail, facsimile and telephone to transfer information. In addition, third-party submission should also be an option.

5. *Is the recommendation that animals be identified prior to entering commerce or being commingled with animals from other premises adequate to achieve timely traceback capabilities to support animal health programs or should a timeframe (age limit) for identifying the animals be considered?*

The recommendation that animals be identified prior to entering commerce or being commingled with animals from other premises is sufficient for accomplishing the goals of the NAIS. Only after entering commerce or being commingled does the risk of disease transmission expand beyond the animal's original premises, requiring an identification device for the reporting of movement events and dates to achieve the traceback necessary to protect the health of the U.S. livestock herd. We do not believe a timeframe or age limit for identifying animals should be mandated.

6. *Are the timelines for implementing the NAIS, as discussed in the Draft Strategic Plan, realistic, too aggressive (i.e., allow too little time), or not aggressive enough (i.e., do not ensure that the NAIS will be implemented in a timely manner)?*

The suggested timeline for implementing the NAIS is realistic, however issues might arise that could cause USDA to modify the proposed plan. The Draft Strategic Plan allows for a voluntary system at the start that gives producers the flexibility to become familiar with the identification program and to participate in the system when they are confident of their knowledge of the program. In reality, demands within the marketplace for traceability will encourage producers to adapt to the animal identification system faster than the suggested timeline. All segments of the livestock industry are developing supply chains where identity and traceability increase the value of an animal.

The only situation in which the NAIS timeline would be considered not aggressive enough is a catastrophic disease outbreak that threatens public health and causes economic bedlam. In this case, the public could demand that the implementation of the NAIS be expedited. USDA should move swiftly in addressing unresolved issues that are important to Missouri livestock producers—cost of the program, confidentiality of information and producer liability.

7. *Should requirements for all species be implemented within the same timelines, or should some flexibility be allowed?*

If funding and staff to implement the NAIS are not a concern, all livestock species listed in the Draft Standard Plan (e.g., cattle, bison, swine, sheep, goats, horses, poultry, alpacas, llamas, deer, elk and aquaculture) should be included in the program. All livestock producers should be eligible and encouraged to apply for a premises registration number for their operation(s). The protocols for individual animal identification numbers should be uniformly applicable to all species, while recognizing species differences in physiology and management for reporting movement requirements, such as allowing group/lot identification for poultry and swine.

If for some reason USDA cannot implement NAIS as proposed, we believe the cattle industry should be the first species targeted by the animal identification program, followed by swine and then sheep and goats. The cattle industry plays an important role in the economic engine of our economy, both from a domestic standpoint and in foreign trade. Due to the attention Bovine Spongiform Encephalopathy (BSE) continues to receive, it is critical that an animal identification system be in position to maintain the confidence of our foreign trading partners and domestic consumers.

8. *What are the most cost-effective and efficient ways for submitting information to the database (entered via the Internet, file transfer from a herd-management computer system, mail, phone, third-party submission of data)?*

The Internet is one of the most cost-effective and efficient means for submitting data to the animal identification database; however, USDA should also allow producers and private entities to transfer information using facsimile, postal mail or telephone. Third-party submission should be an option as well.

9. *Given the information identified in the draft documents, what specific information do you believe should be protected from disclosure and why?*

Nearly all of the information provided by producers for premises registration may be accessed through public records. Our primary concern is protecting animal identification information, as it is not in the public domain and constitutes proprietary information. The Missouri General Assembly passed legislation earlier this year to protect the confidentiality of information provided by our state's livestock producers. We urge USDA to work with Congress to do the same. The American Farm Bureau Federation has submitted draft legislation as an attachment to the comments they submitted on June 29.

10. *How could we best minimize the burden associated with providing information and maintaining records? For example, should both the seller and the buyer of a specific group of animals report the movement of the animals, or is reporting by one party adequate?*

To minimize the burden associated with providing information and maintaining records for the animal identification system, USDA should only require one party to report. The buyer/manager of the receiving premises should be responsible for reporting animal movements. The livestock owner/seller should have the opportunity to report animal movements for his/her own management and recordkeeping purposes, but should not be required to do so.

11. *How should a private database system be funded?*

An accurate cost estimate for a federal government-managed system is necessary in order to evaluate the cost of a private database system. We urge USDA to make available the most current cost estimate of the NAIS, including a breakdown of the cost allocations among the various industry segments.

12. *Should the NAIS allow for multiple privately managed databases? Should a public (government) system be made available as well as a privately managed system so that producers have a choice?*

USDA should ultimately hold all animal identification and animal movement information needed to protect the health of the U.S. livestock herd. However, some producers may wish to use privately-managed commercial databases to maintain their production and proprietary information. These databases would be responsible for submitting to the federally-managed database the portion of information required by USDA for animal and disease tracking purposes.

We believe one common, uniform database will streamline the disease tracking process and prevent confusion that may otherwise result from trying to access information from several private databases.

13. Should a privately managed system include all species?

If a privately managed database were chosen to hold animal location and movement information, it must include all species. Due to the timely and cross-species nature of disease tracking, uniformity throughout the livestock sector is critical to achieve the stated goal of 48-hour full traceability.

14. Would either system work equally well at the state level? Please explain why or why not. When and under what circumstances should the program transition from voluntary to mandatory?

We support one integrated database that connects USDA, states and industry to reduce potential financial and time management burdens. We support a voluntary animal identification program at all levels until the issues of cost, confidentiality and liability are adequately addressed.

Thank you for the opportunity to share our thoughts on the development and implementation of the NAIS. We look forward to working with USDA to address the needs and concerns of Missouri livestock producers.

Sincerely,

Charles E. Kruse
President